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Prepped by Charmelle Mathews

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Consumers' Co-operative Refineries Limited

P.O. Box 260 Regina, Saskatchewan S4P 3A1 Telephone: (306) 721-5353 Fax.: (306) 721-5348

WORLD'S FIRST CO-OPERATIVE REFINERY

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July 10, 1990

Mary T. Smith
Director, Field Operations and Support Division (EN-397F)
U. S. Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Re: Ethyl HiTEC^(R) 3000 (MMT) Docket A-90-16 AUG 10

Consumers' Co-operative Refineries Ltd. is a regional Refiner located in Regina, Saskatchewan Canada. The capacity of the Refinery is 50,000 bbls/day and produces a full range of petroleum fuels including three grades of unleaded gasoline as well as leaded gasoline (up to November 30, 1990).

Our products are sold to some 350 local Co-operative Retails known as the Co-operative Retailing System in the provinces of Manitoba, Saskatchewan, Alberta and British Columbia. Product sales in Alberta and British Columbia are supplied via exchange arrangements with other Refiners.

Gasoline products from the Consumers' Co-operative Refinery facilities have been blended utilizing MMT (now marketed by Ethyl Corporation as HiTEC 3000) as supplied by the Ethyl Corporation since 1978.

The utilization of MMT has been an extremely important blending component for unleaded gasoline for economic product quality improvement and control with respect to octane quality.

During the entire period of utilization of MMT (12 years) up to the present we have not received any customer complaints nor experienced any operational difficulties related to the additive. Any information or comments we have received with respect to catalytic converter plugging have always been related to misfuelling and the utilization of fuel containing Tetraethyl Lead.

We would be pleased to provide further detailed information regarding volumes of gasoline produced, additive rates of MMT and gasoline qualities if this information would be considered useful useful.

Yours truly

B.F. DAHLSTROM, SENIOR VICE PRESIDENT - REFINING

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